

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 24-cv-21376-RUIZ/LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CEREBRAL, INC., *et al.*,

Defendants.

**UNITED STATES' NOTICE OF SETTLEMENT
AS TO DEFENDANT ALEX MARTELLI**

Plaintiff the United States of America filed its Second Amended Complaint for Permanent Injunction, Monetary Relief, Civil Penalties and Other Relief against Defendants Cerebral, Inc., Zealthy, Inc., Gronk, Inc., Bruno Health, P.A., Kyle Robertson, Alex Martelli, and German Echeverry (ECF 119) on May 15, 2025.

The United States and Defendant Alex Martelli have resolved all issues in this matter and the United States has filed a Consent Motion for Entry of a Stipulation for Order for Permanent Injunction against Alex Martelli.

Dated: September 9, 2025

Respectfully submitted,

By: /s/ Francisco L. Unger
Francisco L. Unger (A5503216)
Joshua A. Fowkes (A5503218)
Shana C. Priore (A5503157)
Trial Attorneys

Brett A. Shumate, Assistant Attorney General
Jordan C. Campbell, Deputy Assistant
Attorney General
Sarmad M. Khojasteh, Senior Counsel, Civil
Division
Lisa K. Hsiao, Acting Director, Consumer
Protection Branch
Zachary A. Dietert, Assistant Director

**DEPARTMENT OF JUSTICE CIVIL DIVISION
CONSUMER PROTECTION BRANCH**
450 5th Street, N.W. Suite 6400-South
Washington, D.C. 20044
Telephone: (205) 598-3855 (Unger)
francisco.l.unger@usdoj.gov
joshua.a.fowkes@usdoj.gov
shana.c.priore2@usdoj.gov

Hayden O'Byrne
United States Attorney
Southern District of Florida

Rosaline Chan
Assistant United States Attorney
Fla. Bar No. 1008816
United States Attorney's Office
99 N.E. 4th Street Miami, FL. 33132
Telephone: (305) 961-9335
Rosaline.Chan@usdoj.gov

***Attorneys for Plaintiff the United States of
America***